ROTH & ROTH, LLP

192 LEXINGTON AVENUE, SUITE 802, NEW YORK, NEW YORK 10016 ROTHANDROTHLAW.COM T: (212) 425-1020 F: (212) 532-3801

January 24, 2022

<u>Via ECF</u>
Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: Gilliam, et al. v. City of New York, et al,

21-cv-5263 (RA)

Dear Judge Abrams,

I represent Plaintiffs Marcus Gilliam, Catherina Irving and Randy Grullon in this matter. I write to inform the Court that Defendants consent only to the filing of the Second Amended Complaint, in the form annexed hereto as Exhibit "A", pursuant to FRCP 15(a) (2). Defendants reserve their right to file any Rule 12 motion with respect to the Second Amended Complaint, as well as all other defenses.

Thank you. If you require any additional information, please do not hesitate to have one of your clerks contact me.

Respectfully submitted,

~//s//~

Elliot Shields

CC: All counsel of record, via ECF.